Appendix

(all underlining by the petitioner)

Appendix A

Order

Supreme Court of New Jersey C-185
September term 1982 20,150 On Petition
for Certification filed Supreme Court
11/12/82

To the Appellate Division, Superior Court: A Petition for Certification of the judgment in A-3271-81T1 having been submitted to this court, and the Court having considered the same;
It is ORDERED that the petition for certification is denied on costs.

Witness, the Honorable Robert L. Clifford, Presiding Justice, at Trenton, this 10th day of November, 1982.

Stephen Townsend
Clerk

Appendix B
Order

Superior Court of New Jersey Appellate Division Dkt. A-3271 81T1 Motion M-3896-81 Before Part G Dorothy Cele v. Alfred R. Kinney, Esq. et als Judges: Matthew Pressler-Petrella Moving Papers filed 5/21/82 Answering papers filed 5/21/82 Date Submitted to Court 6/16/82 Date Decided 6/18/82. This matter having been duly presented to Court, it is hereby ordered as follows: Determination of Appeal on Motion for Leave to Appeal out of time: Denied.

For the Court: Robert A. Matthews, P. .A.D. Witness, The Hon. R.A. Matthews P.J. of Part G. Superior Court of New Jersey Appellate Division. This 18th day of June 1982.

Elizabeth McLaughlin
Clerk, Appellate Div.

Filed 6/21/8

Appendix C

Order

Superior Court of New Jersey Appellate Division Docket A-3271-81T1 Motion M-3896-81 Before Part G

Dorothy Cele R. Alfred R. Kinney, Esq. et als Judges: Matthews-Pressler-Petrella Moving papers filed 5/11/82 Answering papers filed 5/25/82 Date Submitted to Court 6/10/82 Date Decided 6/18/82.

This matter having been duly presented to the court, it is hereby ordered as follows: Motion to Dismiss the Appeal Granted. For the Court: Robert A. Matthews, Presiding Judge of Part G, Superior Court of New Jersey, Appellate Division, This 18th Day of June 1982.

Elizabeth McLaughlin
Clerk, Appellate Div.

Filed 6/21/82

Appendix D

Order

Superior Court of New Jersey Appellate Division Docket A-3271-81T1 Before Part G Dorothy Cele v. Alfred R. inney, Esq. et als Judges-Matthews Pressler-Petrella Moving Papers filed 5/27/82 Ans ring papers filed 6/14/82 Date Decided 6/17/82.

This matter having been duly presented to the Court, it is hereby ordered as follows: Motion to Dismiss the Appeal Granted. For the Court Robert A. Matthews, P.J.A.D. Witness, the Honorable Robert A. Matthews Presiding Judge of Part G. Superior Court of New Jersey, Appellate Division, This 18th Day of June 1982.

lizabeth McLaughlin
Clerk, Appellate Div.

Filed 6/21/82

Appendix E

Delinquency Notice

Re: Alfred R. Kinney, Esq.

Supreme Court of New Jersey Anthony Muongo, Esq. 499 Thorrall E., N.J. 08837 Re: Cele v. Kinney, Esq.

Docket 20,150

9 copies of your brief in opposition to the petition for certification or your letter relying on appellate division brief were due August 3, 1982. 9 copies of your appellate division brief and appendix were due August 3, 1982. You must forward a $5.00 filing fee with your papers. Please forward the above papers to this office immediately!

Appendix E

Delinquency Notice Continued

Re: Alfred R. Kinney, Esq.

All Supreme Court briefs and appendices filed out of time must be accompanied by a verified petition and consent order or, if consent is not available from your adversaries, by an original and eight copies (8) of a motion for extension of time.

Note--Failure to file the required papers within seven (7) days of the date hereof will result in the submission of the petition for certification to the Supreme Court only on the basis of your opponent' briefs or such other sanctions as the court may direct.

Dated 9/10/82 Audrey Matisa

Appendix F

Transcript 6/1/81

The Court: May we have the appearances of those people that are present, please?

Mrs. Cele: Dorothy Cele.

Mr. Hurley: Daniel M. Hurley from the firm of Hurley & Vasios representing the defendants Horowitz, Bross & Sinins.

Mr. Cawley: James M. Cawley, Jr., representing Alfred Kinney.

The Court: Now, Mrs. Cele, you're not a member of the bar of the State of New Jersey, that is, you're not an attorney. Is that correct?

Mrs. Cele: That's correct.

Appendix F Continued

The Court: Now, Mrs. Cele you will acknowledge that you and I discussed this case in chambers in the presence of one of my court attendants. Is that correct?

Mrs. Cele: That's correct.

The Court: And at that time, I advised you that the attorney for Mr. Kinney, one of the defendants in the case, had

T2-22 indicated that they would settle the case for $250. I think I further indicated to you that the attorney for the Bross firm had told me that

T2-25 they would not pay any money

Appendix F Continued

The Court: on the case, so the option
T3-1 before you was to proceed with the case or to take the settlement of $250. It's my further understanding that notwithstanding the fact that you're not an attorney, you have done an extensive amount of legal research in this field, and that you do indeed have a background or some intellectual achievement and you do know that in a case like this, you need a lawyer to testify as an expert witness.

Appendix F Continued

Mrs. Cele: I feel it is a victory that I have received a settlement offer of $250. I would have accepted a six cent settlement, so yes,

T4-4 that statement would be correct.

The Court: Do you feel you have been treated fairly in court here this morning?

Mrs. Cele: Absolutely.

The Court: Do you fully understand that this is the end of the case, and it could not be opened at a latter date?

Mrs. Cele: Yes, I understand.

Appendix F continued

The Court: Now, would that statement be accurate, Mrs. Cele?

Mrs. Cele: Yes it is.

The Court: And you realize that without that legal expert to testify on your behalf that your case has a fatal defect in it? Wouldn't that be accurate?

Mrs. Cele: Yes.

The Court: And in view of that, am I correct, Mrs. Cele, that from a practical consideration you're willing to accept the settlement of $250. to dismi dismiss both of these cases,

T3-23 but you have simply told me

T3-24 that notwithstanding that you're not very happy about it?

Appendix F Continued

The Court: And the settlement that you're entering into is with your full volition?

Mrs. Cele: Yes, absolutely.

The Court: Now, Mr. Hurley, is there anything that you want to put on the record?

Mr. Hurley: Will the court require the plaintiff to sign a stipulation of dismissal with prejudice, or an order to the effect that the case is dismissed with prejudice prior to leaving court today.

Appendix F Continued

The Court: Well, the case is going to be dismimsed with prejudice subject to the settlement agreement of $250.
I mean the case has been assigned out by the Assignment Judge, and it will either be settled or tried, and Mrs. Cele understands the impediment she has.

T5-4 She cannot try the case, and is accepting the settlement so there is a dismissal with prejudice.

Mr. Hurley: Right, and the dismissal with prejudice being on

Appendix F Continued

the record, can we draw an order to that effect?

The Court: Yes.

Mr. Hurley: Thank you. T5-11.

Mr. Cawley: Your Honor, for the record, I talked to my client, Alfred Kinney, this morning, and he advised me that he was willing to offer $250. to settle this case, which

T5-16 I related to you in chambers.

The Court: All right. Mrs. Cele, that would conclude the matter, and the only comment that I would make is that perhaps you could look to the future,

Appendix F Continued

and good luck to you.

Mrs. Cele: Absolutely, and thank you ever so much to the entire court.

Mr. Cawley: Your Honor, one more point. I wanted to get a release from Mrs. Cele on the $250.

The Court: Yes. Let me explain that to you, Mrs. Cele.

Mr. Cawley: And I'll draft it.

The Court: This is regular court procedure, Mrs. Cele. Mr. Cawley will forward to you a release, and when you

Appendix F Continued

The court: sign that release and forward it to him, then at that point, you will receive back a check or draft of the $250.

Mrs. Cele: Yes.

The Court: Do you understand that?

Mrs. Cele: Absolutely.

The Court: Allright, fine. Thank you.

Mr. Cawley: Thank you, our Honor. T6-13.

Whereupon the June 1, 1981 proceeding was concluded.

Appendix G

pro se: Mrs. Dorothy Cele 336 E. Pkwy. 4 Irvington, N.J. 07111 (201)374-6337
Superior Court of N.J. Law Division: Essex County Dkt. L 64596-79 Cele v. Alfred R. Kinney, Esq. and Horowitz, Bross & Sinins Original filed 3/11/80
Re: More Definite Statement Motion 294

To: Hon. Paul B. Thompson,J.S.C. Essex County Court Newark, N.J. 07102

Dear Sir,

The plaintiff, Mrs. Dorothy Cele says that accident victims are protected by law and the attorney is never justified in the erroneous use of the law.

For misery, plaintiff says:

1. The charge is obtaining money under false pretense.

2. Failing to without justification,

Appendix G

render the legal advice and services that the attornies agreed to render and for the fee agreed upon.

Mrs. Dorothy Cele

March 11, 1980

I hereby certify that the foregoing is a true copy of the original on file in my office.
W. Lewis Bambrick, Clerk

Appendix H

Supreme Court of New Jersey District Fee Arbitration Committee For Essex County District V Mrs. Dorothy Cele 336 Eastern Pkwy. 4 Irvington, N.J. 07111 Horowitz, Bross & Sinins, Esq. 1180 Raymond Blvd. Newark, N.J.07102
Re: Cele v. V1979-57F

January 17, 1980

Dear Mrs. Cele and Gentlemen:

Please be advised that the hearing in connection with the case of Cele v. Horowitz, Bross & Sinins will be held at the offices of Riker, Danzig, Scherer & Hyland, 744 Broad Street, Newark, N.J., 14th Fl., on Tues., January 29, 1980 at 10:00 a.m.

Very truly yours,
William C. Connelly, Esq.

WCC:elm
cc: Joseph A. Bottitta, Esq.
David R. Gross, Esq.
Mr. Robert Bohrer

Appendix I

Supreme Court of New Jersey District Fee Arbitration Committee for Essex County District V Mrs. Dorothy Cele 336 Eastern Parkway 4 Irvington, N.J. 07111 Re: Cele V1979-57F

January 29, 1980

Dear Mrs. Cele,

Please be advised that the hearing in connection with the above matter scheduled for Tuesday, January 29, 1980 at 10:00 a.m. at our office has been adjourned. We will advise you shortly as to the new date.

Very truly yours,

William C. Connelly

WCC: elm

Appendix J

Supreme Court of New Jersey District Fee Arbitration Committee for Essex County District V Mrs. Dorothy Cele 336 Eastern Parkway 4 Irvington, N.J. 07111 Horowitz, Bross & Sinins, Esq. 1180 Raymond Blvd. Newark, N.J. 07102 Re: Cele v. V1979-57F

April 1, 1980

Dear Madame and Sirs:

Please be advised that the hearing in connection with the above matter scheduled for Tuesday, April 8, 1980 at 10:00 a.m. at our office has been adjourned. We will advise you shortly as to the new date.

Very truly yours,
William C. Connelly

WCC: elm
cc: Joseph A. Bottitta, Esq.
Mr. Robert Behrer
Jerome J. Graham, Jr., Esq.

Appendix K

336 Eastern Parkway 4 Irvington, N.J. 07111 Robert D. Lipscher, Esq.
Administrative Director of Courts
State House Annex R. 402 CN-037
Trenton, N.J. 08625

Re: Cele v. V1979-57F

Dear Sir, June 5, 1980

This letter concerns my experience with two lawyers in Essex County since February 1977 with respect to an automobile accident in which I was injured as a pedestrian February 22, 1977.

On May 14, 1980, I teleponed an attorney in Gloucester County who understands the human aspect of the

Appendix K

attorney/client relationship. He told me that you are the person who helps and that within the legal profession there are those who care.

I referred said matter to the District Fee Arbitration Committee on June 4, 1979 and June 14, 1979. A hearing was scheduled for January 29, 1980 and then was unexplainedly adjourned. The hearing was rescheduled for April 8, 1980 and then was again unexplainedly adjourned Since that time there has been only silence. I believe the silence to be another violation of right requiring professional inquiry beyond my

Appendix K

authority and query.

This letter is to kindly request such an inquiry into the above entitled matter. Both lawyers are represented by fellow attornies. I am unrepresented. It would be helpful for the aggregate good to have this problem solved.

Thank you kindly. Best regards.

Sincerely,

Mrs. Dorothy Cele

Enclosures
certified mail: 1608477

Appendix L

Administrative Office of the Courts

State Office Bldg. Taylor Pl. and
Capitol St. CN-037 Trenton, N.J. 08625
Mrs. Dorothy Cele v. Horowitz, Bross &
Sinins, et al. Docket Number V-1979-57F

June 18, 1980

Dear Mrs. Cele,

In response to your letter of June 5, 1980 to the Admin. Director of the Courts concerning the above fee arbitration matter, pleae be advised that I have on this date spoken with Mr. Roger H. McGlynn, Chairman of the Dist. V Fee Arbitration Committee and Mr. McGlynn has informed me that he would correspond with you concerning this matter in the near future.

Very truly yours,
Richard J. Englehardt
Staff Attorney Ethics
and Professional Services

RJE/yef
cc:RHM w/enc.

Appendix M

Supreme Court of New Jersey District Fee Arbitration Committee for Essex County District V 550 Broad St. 16th floor Newark, N.J. 07102 (201) 622-2300

Mrs. Dorothy Cele 336 Eastern Parkway Irvington, N.J. 07111 Sheldon Bross, Esq. Horowitz, Bross & Sinins 1180 Raymond Boulevard Newark, N.J. 07102

Alfred R. Kinney, Esq. 1000 Springfield Ave., Irvington, N.J. 07111 David P. Cybulski, Esq. Conway, Reiseman, Bumgardner, Hurley & Kleinfeld 50 Park Place Newark, N.J. 07102 Willette & Luongo 70 Wood Avenue S Iselin, N.J. 08830

Re: Cele v. Horowitz, Bross & Sinins, et al V-1979-57F

June 27, 1980

This matter has been referred to me

Appendix M

as Chairman of the District Fee Arbitration Committee for Essex County, District V, following the assignment of it to a panel of our Committee for consideration on November 7, 1979. I am in receipt of a copy of a letter of Dorothy Cele dated June 5, 1980 directed to the Administrative Director of the Courts and a reading of this letter will indicate the reason as to why no subsequent hearing has been scheduled.

The matter was originally submitted as a request for arbitration by Dorothy Cele. On May 31, 1979 Dorothy Cele filed with this Committee a request for arbitration of a fee dispute against Horowitz, Bross & Sinins arising out

Appendix M

of their representation of Mrs. Cele in an automobile negligence case (Cele vs. Johnson). On June 4, 1979 the complainant supplemented her written statement of facts by an additional 15-page letter. On June 16, 1979 the complainant supplemented the request with numerous documents and a letter to the Committee. On June 25, 1979 the plaintiff requested that the matter be referred to the Essex County Committee for unethical and Unprofessional Conduct and advised this Committee that she proposed to institute a civil action against the firm of Horowitz, Bross & Sinins and Alfred R. Kinney for malpractice in

Appendix M

connection with her suit (Cele vs. Johnson). On June 27, 1979 this Committee received a letter from the firm of Horowitz, Bross & Sinins stating that they had received a check in settlement of the case of Cele vs. Johnson in the amount of $35,000.00 and that Mrs. Cele, Alfred R. Kinney and the firm of Horowitz, Bross and Sinins had agreed as follows:

1. Dorothy Cele was to endorse the draft in the amount of $35,000.00 and the said draft was to be deposited in the trustee account of Horowitz, Bross & Sinins.

2. Upon clearance of this draft,

Appendix M

Mrs. Cele would be issued a check from the trustee account of Horowitz, Bross & Sinins in the amount of $24,886.06, Horowitz, Bross & Sinins would be issued a check in the amount of $8,903.94 representing a fee in the amount of $8,698.69 and disbursements in the amount of $205.25. Alfred R. Kinney for services rendered would be entitled to a fee to be agreed upon, it being understood that Mr. Kinney would become a party to the District Fee Arbitration Committee proceedings and further that if the District Fee Arbitration Committee ruled

Appendix M

that the total fee withheld for attorney's fees in the amount of $8,698.69 was excessive, the firm would refund the difference to Mrs. Cele who agreed to be bound by the terms thereof.

On July 10, 1979 this Committee a response from Alfred R. Kinney setting forth that he had initially represented Mrs. Cele in the case of Cele v. Johnson, that Mrs. Cele had signed a retainer agreement and that at her request he forwarded the papers and agreed to the substitution of Horowitz, Bross & Sinins as attorneys in the proceeding.

On August 16, 1979 this Committee

received a response from Horowitz, Bross & Sinins setting forth that they had been engaged as substituted attorneys in lieu of Alfred R. Kinney to represent Mrs. Cele in the negligence action, that after being so substituted they entered into settlement negotiations and were eventually successful in settling Mrs. Cele's case in the amount of $35,000.00. A copy of the retaining agreement was annexed.

On August 23, 1979, following notification to this Committee, Mrs. Cele filed a complaint in the Superior Court of New Jersey against Alfred R. Kinney and Horowitz, Bross & Sinins in

Appendix N

connection with their representation of her in the case of Cele vs. Johnson. In the complaint so filed the complainant charged that both Alfred R. Kinney and Horowitz, Bross & Sinins failed to represent her properly in the proceedings, alleging 26 various act which she characterizes as being unprofessional, unreasonable and neglectful. The complaint was prepared by Mrs. Cele pro se and it is difficult to summarize the charges of the complaint.

On November 7, 1979 the matter was referred to a fee arbitration panel

for hearing and a notice in connection with the matter was mailed to the interested parties. At that time there were delivered to the Committee boxes containing the pleadings and letters of Mrs. Cele. On November 27, 1979 Mrs. Cele served upon the panel various additional papers which became part of the file. On November 30, 1979 an order was entered in the Superior Court of New Jersey filed by Judge Paul B. Thompson allowing the plaintiff to amend the complaint filed in the proceedings against Horowitz, Bross & Sinins and Alfred K. Kinney and on November 30, 1979 the amended complaints were so served. On December 18, 1979

Appendix M

the defendant, Alfred R. Kinney, filed an answer to the amended complaint and also filed a demand for trial by jury. Various pleadings are still being filed in the matter. Attached to the file copy of this letter are copies of the Complaint and Amended Complaints consisting of a total of 67 paragraphs and six counts.

Several hearings were scheduled by the Fee Arbitration Panel in connection with this matter, all of which were adjourned at the request of one or more of the parties involved. However, upon receipt of

Appendix M

the various pleadings in the Superior Court proceedings, the panel sought to determine whether it was desirable to conduct a hearing in connection with the reasonableness of the fee in light of continuation of the Superior Court Case involving charges of malpractice against the attorneys who represented Mrs. Cele in the utomobile negligence case which gave rise to the proceedings. Judge Thompson, through his secretary, advised the panel that he proposed to continue the proceedings before him.

As a result, the law suit involves substantial legal questions in addition

Appendix M

it is asserted by Dorothy Cele in her papers to this Committee that no fee is due the attorneys in view of their improper representation of her. As stated, it is clear that the primary issues in dispute between the parties raise substantial legal questions in addition to the basic. Under the appropriate rules of the New Jersey Supreme Court, specifically Rule 1:20A-2 this Committee may decline arbitration of disputes "where the primary issues in dispute raise substantial legal questions in addition to the basic fee dispute." Additionally, an attempt by this committee to resolve the fee

dispute, if this aspect could be separated and isolated, could result in an award to a judgment eventually entered in the pending law suit. Such contrary results would only lead to further protracted and expensive litigation.

It is, therefore, the determination of this Committee that the within involving issues of a substantial legal nature, in addition to the basic fee dispute, should not be heard by this Committee The appropriate forum to properly and finally dispose of all issues between the parties is the court which Dorothy Cele invoked. The Complaint

Appendix M

is dismissed. All papers of either party in the possession of this Committee will be returned upon request.

Respectfully Submitted,
Roger H. McGlynn,
Chairman, District Fee
Arbitration Committee

RHM:adg

cc: Joseph A. Bottitta, Esq.
(with attachments)

Appendix N

20 South 36th Street (707) Phila.
Penna. 19104 Richard L. Bland, Jr.
Esq., Sec. District Ethics Committee
26 Clinton Street Newark, N.J. 07102
Re: V-1980-62E

July 31, 1980

Dear Mr. Bland,

Thank you kindly. Kindly be advised that I wish to withdraw the complaint submitted April 15, 1980 regarding Alfred R. Kinney, Esq. I have since read new information which explains the proper procedure in the entire matter.

Thank you. Best regards.

Sincerely,

Mrs. Dorothy Cele

Received
Central Ethics August 28, 1981
Administrative Office of the Courts

Appendix O

Supreme Court of New Jersey District Ethics Committee For Essex County District V Mrs. Dorothy Cele 20 South 36th Street (707) Phila. Penna. 19104
Re: V-1980-62E

October 9, 1980

Dear Mrs. Cele:

Please be advised that the above captioned matter has been considered withdrawn and we are closing our files.

Very truly yours,
Richard L. Bland, Jr.,

RLB/dab
enclosures
cc: Alfred R. Kinney, Esq.
Central Ethics

Received
Central Ethics August 28, 1981
Administrative Office of the Courts

Appendix P

Know all men by these Presents: that Dorothy Cele hereinafter designated as the Releasor, for and in consideration of the sum of ($250.) dollars lawful money of the United States of America, to the Releasor in hand paid by Alfred R. Kinney hereinafter etc. etc. etc. more particularly for any and all claims which are the subject matter of the lawsuit docketed in the Superior Court of New Jersey, Law Division, Essex County. The name of the lawsuit is Dorothy Cele vs. Alfred R. Kinney, Esq. and Horowitz, Bross & Sinins bearing Docket Number L -64596-78.

unsigned

Dorothy Cele

Appendix Q

Richard L. Bland, Jr., Esq. Secretary
District Ethics Committee Essex County
District V 26 Clinton St. Newark, N.J.
0710:

February 21, 1982
Mailgram

Dear Mr. Bland,

This mailgram is to request of the Dist. Ethics Comm. Office acknowledgement as required by regulation of the Supreme Court of New Jersey of the Certified mail listed below:

1. CMRRR 718185 8/18/81 notarized letter of complaint
2. CMRRR 612687 9/21/81 Letter
3. CMRRR 722747 11/4/81 Letter
4. CMRRR 718527 1/20/82 Statement of case- Letter of Complaint dated 8/8/81.

Appendix Q

5. Letter dated 1/25/82 statement copies of certified return receipts in certification of mailing to the District Ethics Commmittee Office and all counsel of record regarding Alfred R. Kinney, Esq. and Horowitz, Bross & Sinins 64596-78 V1980-57F V1980-62E..

Thank you. Best regards.

Sincerely,

Mrs. Dorothy Cele

cc: Robert D. Lipscher, Admin. Dir.

Richard J. Englehardt, Esq.

Staff Attorney

Appendix R

Administrative Office of the Courts
State of New Jersey Robert D. Lipscher
Administrative Director of the Courts
CN-037 Trenton, New Jersey 08625
Re: Cele v. Alfred R. Kinney, Esq. and
Horowitz, Bross & Sinins

July 15, 1982

Dear Mrs. Dorothy Cele,

On behalf of Administrative Director Robert D. Lipscher I acknowledge receipt of your several letters all dated June June 14, 1982. Specifically it appears that you are alleging that Richard Bland and Harold Rubenstein fraudulently filed with the Administrative Office of the Courts on August 28, 1981 your letter to Mr. Bland dated July 31, 1980

withdrawing your your ethics complaint against the above attorneys and Mr. Bland's letter of October 9, 1980 to you accepting that withdrawal. Unless your signature on the letter of July 31, 1980 is false, fraudulent, fititious or otherwis lacking in genuiness, it would appear that your complaint is misplaced.

Without begging the issue it appears that you clearly desire to file an ethics complaint against Messrs. Kinney, Horowitz, Bross and Sinins. Please be advised that you are free to do so. If you withdrew the complaint against them in 1980, you can now reinstitute

the complaint provided that all collateral litigation has been concluded. No one is trying to stop you from filing an ethics complaint with the District V Ethics Committee. Please be guided accordingly.

Very truly yours,

David E. Johnson, Jr.
Chief Ethics and
Professional Services

Appendix S

20 South 36th St.(707)
Phila. Penna. 19104

Daniel F. O'Connell, Esq. District VII
Ethics Committee Office Supreme Court
of New Jersey 150 Finley Avenue Box 407
Baskingridge, New Jersey 07920

July 19, 1982

Dear Mr. O'Connell,

This letter is to kindly request information as to how to file an ethics complaint in Mercer County.

Thank you. Best Regards.

Sincerely,
Mrs. Dorothy Cele

Appendix T

Supreme Court of New Jersey District Ethics Committee for Hunterdon, Mercer and Somerset Counties District VII

PRIVATE AND CONFIDENTIAL
Mrs. Dorothy Cele Divine Tracy Hotel
20 South 36th St. (707) Phila. Penna.
19104

August 6, 1982

Dear Mrs. Cele,

In response to your letter of July 19, 1982, if you have a complaint concerning representation by a lawyer located in either Mercer, Hunterdon or Somerset Counties, you should outline, in a to me, the specific complaint that you have concerning the lawyer's representation. In addition, you

Appendix T

should name the lawyer, giving his address and telephone number so that I can assign the matter out for investigation. Upon receipt of such a complaint a member of our Committee will interview you and the attorney involved to determine whether there is evidence of unethical or unprofessional conduct. A report will be issued and a formal hearing held. If you have any further questions concerning the procedure of our Committee, please call my office directly.

Very truly yours,
Daniel F. O'Connell, Esq.
Secretary

DFOC: ee
cc: John J. Trombadore, Esq.
w/copy of letter

Appendix U

Supreme Court of New Jersey District Et Ethics Committee For Hunterdon, Mercer and Somerset Counties District VII

PRIVATE AND CONFIDENTIAL

Colette A. Coolbaugh, Esq. Assistant Director Ethics & Professional Services

Administrative Office of the Courts

State Office Building Taylor Place & Capitol Street CN 037 Trenton, NJ 08625

Re: Cele v. David E. Johnson, Jr., Esq.

November 5, 1982

Dear Mrs. Coolbaugh,

I am enclosing herewith a complaint filed with my office by Mrs. Dorothy Cele, which has been filed against David E. Johnson, Jr., Esq., Chief Administrative Office of the Courts

Appendix U

Because of our working relationship with Mr. Johnson, I do not feel that it is appropriate that our committee, the District VII Ethics Committee, conduct the investigation in this case.

I would appreciate your referring this matter to the appropriate investigating party, and advising both myself and Mrs. Cele of the disposition of this matter.

The following items are included with this letter.

1. Letter from Dorothy Cele to Daniel F. O'Connell dated July 19, 1982.

Appendix U

2. Letter from Daniel F. O'Connell to Mrs. Dorothy Cele dated August 6, 1982.

3. Letter from Dorothy Cele to Daniel F. O'Connell, dated August 31, 1982, together with envelope sent certified mail.

4. Letter dated October 7, 1982 from Dorothy Cele to Daniel F. O'Connell, together with appropriate envelope.

5. Letter dated August 31, 1982, sworn to November 1, 1982, received November 4, 1982, from Dorothy Cele to Daniel F. O'Connell.

6. Letter dated November 1, 1982,

Appendix U

received November 5, 1982, from Dorothy Cele to Daniel F. O'Connell, which letter contains three copies, which has attached to it a telegram dated November 2, 1982 from Dorothy Cele to Daniel F. O'Connell.

Thanking you for your cooperation in this matter.

Very truly yours,
Daniel F. O'Connell

DFO
Enclosures
cc: John J. Trombadore, Chairman
Mrs. Dorothy Cele

Appendix V

Administrative Office of the Courts
State of New Jersey Robert D. Lipscher
Administrative Director of the Courts
CN-037 Trenton, New Jersey 08625

Re: Cele v. Alfred R. Kinney, Esq. and Horowitz, Bross & Sinins

November 29, 1982

Dear Mrs. Cele,

Your recent letter of August 31, 1982 to Daniel F. O'Connell, Esq., Secretary of the District VII Ethics Committee, concerning the advice given to you by David E. Johnson, Jr., Esq. has been referred to me for handling since Mr. Johnson is a state employee and not

Appendix V

engaged in the private practice of law. I have reviewed your ethics files in the in the matter of Cele v. Alfred R. Kinney and Horowitz, Bross and Sinins Attached is Mr Johnson's letter to you dated July 15, 1982. This letter correctly and appropriately advises you of the facts of your case and the procedure to be followed. You have withdrawn your ethics complaint previously.

You are at liberty, if you desire to reinstate that complaint by filing a detailed letter with Mr. Harold Rubenstein secretary of the

Appendix V

District Ethics Committee, specially setting forth your allegations of unethical or unprofessional conduct. You have made broad and to thispoint totally unsubstantiated allegations of fraud, by Mr. Johnson, by Mr.Rubenstein by Mr. Bland and others. You have submitted no proof whatsoever to substantiate such allegations. Therefore, no action is warrented and those matters are at a close.

Very truly yours,
Colette A. Coolbaugh
Assistant Director
Ethics and Professional
Services

CAC/bk
encs.

Appendix W

Robert D. Lipscher, Administrative
Director of the Courts CN 037
Administrative Office of the Courts
Richard J. Hughes Justice Complex
Trenton, New Jersey 08625

Re: Cele v. Alfred R. Kinney, Esq.
and Horowitz, Bross & Sinins

February 9, 1983

Dear Mr. Lipscher,

David E. Johnson, Jr. Esq. and Colette A. Coolbaugh, Esq. (and others as named in the enclosure) claim to be representative of you. Utter untruth.

The greater the man the finer and kinder he is.

Best regards.

Sincerely,
Mrs. Dorothy Cele

cc: U.S. Clerk
Enc. Certiorari

END OF DOCKET